

Clearing Desktop Report – Short Form



1. PROPOSAL DETAILS

Proposal Name:	LCSS - M028 – Midlands Road SLK 61.30 – 77.08		
Region/Directorate:	Regional Management & Operations Directorate / Wheatbelt		
Local Government:	Shire of Moora		
Road/Bridge Name & Number:	Midlands Road		
Proposal Location (SLK):	SLK 61.30 – SLK 77.08		
CDR Short Form TRIM Number:	D25#544868		
Spatial Data TRIM Number:	CPS 818 Clearing: D25#311197		
EOS Number:	2704		
Expected Proposal Start Date:	July 2025		
Oracle Project No:	30003813	Task Code:	19301
LISC TRIM Number:	D25#58186	HRA TRIM Number:	D25#27372

2. PURPOSE OF CLEARING

The proposed works involve widening the existing seal width along a section of Midlands Road to meet Road Safety Management (ROSMA) safety standards. Three trees within 5.5 metres of the road centreline are required to be removed under the MRWA Clearing Permit CPS818 as they pose a high safety risk to road users. This Clearing Desktop Report (CDR) has been developed to support the CPS818 assessment for clearing of native vegetation (x3 trees), specifically located within the Midlands Road (M028) Reserve at Straight Line Kilometre (SLK):

1. [REDACTED] Left Hand Side (LHS),
2. [REDACTED] (LHS), and
3. [REDACTED] Right Hand Side (RHS)

The Proposal Area has been subjected to a Biological Survey by Biologic in 2023.

3. ALTERNATIVES TO CLEARING

The proposed works involve shoulder sealing activities of approximately 15 kilometres along the M028 road alignment and the removal of trees that are within 5.5 metres of the road centreline that present as an unacceptable safety risk to motorists. Alternatives to clearing include the installation of crash barriers, or alternative re-alignment of the road infrastructure. Whilst crash barriers are a potential solution to avoid clearing, these may increase dangers to other motorists by bouncing back onto the opposite side of the road into oncoming traffic. To manage this risk, removal of the trees is the safest option for motorists and barrier installation is reserved for high-value environmental receptors. An alternate road re-alignment would be an extremely costly exercise and make the project unfeasible.

4. MEASURES TO AVOID, MINIMISE, MITIGATE AND MANAGE PROPOSAL CLEARING IMPACTS

The following alternatives to native vegetation clearing were considered during the development of the proposal:

- The proposed clearing is only for three (3) trees that are confirmed will be a significant safety risk to motorists on completion of Low-Cost Shoulder Sealing (LCSS) works. The works have avoided clearing of additional trees not located within 5.5m of the road centreline as they do not currently pose an unacceptable safety risk to road users.
- Main Roads retains frangible vegetation where a clear zone is to be established for road projects. For this project, however, clearing will only be required to accommodate the road formation, with no clear zone being established. Accordingly, the retention of frangible vegetation does not apply to this proposal. Mature trees that are greater than 5.5 metres from road centreline are to be retained.

- Reducing the speed limit to minimise clearing requirements, while still balancing safety (driver fatigue) and freight efficiency. Speed Limits are an essential mechanism to ensure the safe and efficient operation of road networks. The application of appropriate speed limits and other traffic management measures is a key mechanism in managing vehicle speeds to achieve desired safety, mobility, traffic management, local amenity, and road user expectations. There are several factors involved in road safety, including road conditions, driver behaviour and overall road design. Except in special situations, reducing speed limits below national standards on state and national roads is not typically supported as it has the potential to contribute to driver frustration, impatience, tiredness and recklessness. The environmental values protected by reducing the speed limit, do not justify the impacts on freight efficiencies nor road user safety. Accordingly, the reduction of the speed limits to avoid clearing of native vegetation for this proposal is not proposed.

5. APPROVED POLICES AND PLANNING INSTRUMENTS

The clearing of native vegetation in Western Australia is regulated under the *Environmental Protection Act 1986* (EP Act) and the Environmental Protection (Clearing of Native Vegetation) Regulations 2004 (Clearing Regulations).

In addition to the matters considered in accordance with section 51O of the EP Act (see Section 1.3), Main Roads has also had regard to the following documents.

Environmental Protection Policies:

- Environmental Protection (Peel Inlet - Harvey Estuary) Policy 1992
- Environmental Protection (Western Swamp Tortoise Habitat) Policy 2011

Other legislation of relevance for assessment of clearing and planning/other matters:

- Biodiversity Conservation Act 2016* (WA) (BC Act)
- Conservation and Land Management Act 1984* (WA) (CALM Act)
- Country Areas Water Supply Act 1947* (WA) (CAWS Act)
- Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)
- Planning and Development Act 2005* (WA) (P&D Act)
- Soil and Land Conservation Act 1945* (WA)
- Rights in Water and Irrigation Act 1914* (WA) (RIWI Act)
- Aboriginal Heritage Act 1972* (WA) (AHA)
- Town Planning and Development Act* (WA) 1928

Relevant other policies and guidance documents:

- Environmental Offsets Policy (Government of Western Australia, 2011)
- A guide to the assessment of applications to clear native vegetation (DER, 2014)
- Procedure: Native vegetation clearing permits (DWER, October 2021)
- Environmental Offsets Guidelines (Government of Western Australia, August 2014)
- Technical guidance – Flora and Vegetation Surveys for Environmental Impact Assessment (EPA, 2016)
- Technical guidance – Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment (EPA, 2020)
- Approved conservation advice under section 266B of the EPBC Act for threatened flora/fauna/vegetation communities
- Approved Recovery Plans for threatened species
- EPBC Act Referral guidelines for the three threatened black cockatoo species
- Strategic advice - EPA

6. CLEARING AREA

Clearing Area (ha):	0.002	No. Trees Cleared:	Three
Species Name(s):	2x <i>Eucalyptus loxophleba</i> and 1x <i>Acacia acuminata</i>		
Easting and Northing:	[REDACTED]		

7. EXISTING ENVIRONMENT AND SITE INFORMATION

Site Vegetation Description/Association:	142 – Woodland Other; Medium Woodland; York Gum, Salmon gum, & gimlet
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Site Vegetation Condition:	Overlaps areas mapped as Cleared, Degraded, and Completely Degraded (Biologic, 2023).
Pre-European Extent Remaining (%):	26.44% (Statewide), 10.65% (Geraldton Sandplains IBRA Bioregion), 12.45% (Lesueur Sandplain IBRA Sub-region), and 7.7% (Local Government Authority).
8. ASSESSMENT OF PROPOSAL AGAINST CLEARING PRINCIPLES	
Is vegetation to be cleared at variance with:	Justification or Evidence:
Principle (a) – Native vegetation should not be cleared if it comprises a high level of biological diversity.	The Proposal Area consists of (3) three individual trees to be cleared, which includes (2) two <i>E. loxophleba subsp. loxophleba</i>, and (1) one <i>Acacia accuminata</i>. The trees proposed to be cleared are not Threatened or Priority-listed flora, nor are they part of a Threatened Ecological Community (TEC) or Priority Ecological Community (PEC). Furthermore, the trees are not part of a conservation area, nor do they form part of a linkage or ecological corridor to any conservation areas. The proposed clearing does not impact any Environmentally Sensitive Areas (ESAs) or other features of biodiversity value, such as wetlands. The trees proposed for clearing are unlikely to support a high level of fauna diversity, considering there is no native understorey present to allow ground dwelling fauna to forage, shelter or disperse. The two <i>E. loxophleba</i> trees at [REDACTED] are a part of a small patch of roadside vegetation that is surrounded by cleared agricultural land and roads. Neither of these trees are suitable Diameter at Breast Height (DBH) to be classified as Black Cockatoo habitat trees. <i>E. loxophleba</i> is not a priority breeding, roosting, or foraging species for Black Cockatoos (MRWA Black Cockatoo Fact sheet, D19#1011841). The nearest known Carnaby's Black Cockatoo breeding site is approximately [REDACTED] km away from the two <i>E. loxophleba</i> trees to be cleared at SLK 64.96 (BC_WTC_BreedSite). The nearest known Forest Red-tail Black Cockatoo breeding site is over [REDACTED] km north of the trees to be cleared at [REDACTED] (BC_FRTBC_BreedSite). The one <i>Acacia accuminata</i> at [REDACTED] is not a suitable DBH tree (Biologic, 2023) does not contain any hollows, and is part of a small roadside strip of vegetation that has negligible ecological corridor or connectivity value to allow native fauna to disperse to larger remnants of native vegetation. Proposed works will have no impact on actual Black Cockatoo breeding habitat. Both <i>E. loxophleba</i> and <i>A. accuminata</i> provide no to low value foraging value foraging habitat value for Carnaby's Cockatoo and are not likely to be an important foraging resources in a local context given the availability of larger remnants of native vegetation locally. Biologic (2023) identified 1,252 DBH trees within the survey area that are potentially suitable breeding habitat for black cockatoos. There is approximately 55,722.98 ha of remnant vegetation within a 20 km radius of the proposal area (DBCA-011). This remnant vegetation is likely to provide higher quality foraging and breeding habitat than the three non-DBH roadside trees. The three trees to be cleared (total of 0.021ha) equate for 0.003% of remnant vegetation within a 20 km radius of the Proposal Area.

	Based on the above, the proposed clearing is not at variance to this Principle.
Principle (b) – Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.	The proposed clearing includes one <i>A. acuminata</i> and two <i>E. loxophleba subsp. loxophleba</i> trees over no native understorey. As further discussed below, the three trees proposed to be cleared do not provide significant habitat for any fauna species. Based on the findings of the biological survey undertaken by Biologic (2023), the trees proposed for clearing only provide potential habitat for <i>Dasyurus geoffroii</i> (Chuditch), <i>Leipoa ocellata</i> (Malleefowl), and <i>Zanda latirostris</i> (Carnaby's Black Cockatoo) Chuditch: Initial desktop surveys identified the Proposal Area as potential habitat for Chuditch; however, the fauna survey by Biologic (2023) did not identify any evidence (i.e. diggings, scats) of Chuditch occurring within the Proposal Area. The clearing of one <i>A. accuminata</i> and two <i>E. loxophleba subsp. Loxophleba</i> will have no impact on Chuditch habitat. Malleefowl: Initial desktop surveys identified the Proposal Area as potential habitat for Malleefowl; however, the fauna survey by Biologic (2023) did not identify any evidence (i.e. active or remnant mounds) of Malleefowl occurring within the Proposal Area. The clearing of one <i>A. accuminata</i> and two <i>E. loxophleba subsp. loxophleba</i> will have no impact on Malleefowl habitat. Carnaby's Black Cockatoo: Neither of the two <i>E. loxophleba</i> trees proposed for clearing at [REDACTED] are suitable DBH trees, none contain hollows and all are part of a small roadside strip of vegetation that has negligible ecological corridor or connectivity value to allow native fauna to disperse to larger remnants of native vegetation (Biologic, 2023). The trees provide low value foraging habitat for Carnaby's Cockatoo and are not likely to be an important foraging resource in a local context, given the lack of mapped roosting and breeding trees within [REDACTED] km, and the availability of larger remnants of native vegetation locally, as discussed in Principle A. The vegetation to be cleared is in a Degraded to Completely Degraded condition with an understory dominated by agricultural weeds and devoid of native species. <i>Acacia accuminata</i> is not a known breeding or foraging tree species for Carnaby's Cockatoo (Grom, 2011). The proposed clearing of one <i>Acacia accuminata</i> at [REDACTED] is not going to be an important foraging resource. Based on the above, the proposed clearing is not at variance to this Principle.

Principle (c) – Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.	The proposal consists of clearing one <i>A. accuminata</i> and two <i>E. loxophleba subsp. loxophleba</i> only, neither of which are threatened flora species. According to Western Australian Herbarium and DBCA datasets, the nearest threatened flora record is <i>Acacia cochlocarpa subsp. cochlocarpa</i>, located approximately [REDACTED] km north. Given that the proposed clearing is limited to three overstorey trees and does not contain any native understorey or groundcover, threatened flora species won't be impacted by the proposed clearing. Based on the above, the proposed clearing is not at variance to this Principle.
Principle (d) – Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a threatened ecological community.	A desktop assessment of mapped Threatened Ecological Communities (TECs) within the Study Area (20 km radius of the proposed clearing area) identified that the (3) three trees to be cleared are not within the boundary or buffered extent of any TEC. The TEC GIS database results are reinforced by Biologic (2023), who did not identify any TEC overlapping with the Proposed clearing locations. Based on the above, the proposed clearing is not at variance to this Principle.
Principle (e) – Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.	The Proposal Area is mapped as occurring within Vegetation Association 142 (Woodland Other; Medium Woodland; York Gum, Salmon gum, & gimlet) (Government of Western Australia, 2019). Vegetation Association 142 (York Gum woodland) was historically broadly mapped to occur within the Proposal Area and has less than 30 % of its Pre-European extent remaining at the State, IBRA bioregion, IBRA sub region and Local Government levels (i.e. Shire of Moora) with 26.44%, 10.65 %, 12.45%, and 7.70 % remaining respectively. However, the vegetation proposed for clearing consists of three roadside trees in a Completely Degraded condition and is not representative of a York Gum woodland (Biologic, 2023). The proposed clearing will not sever a significant ecological linkage across the landscape and is not considered to be a significant remnant of Vegetation Association 142. Based on the above, the proposed clearing is not at variance to this Principle.
Principle (f) – Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.	The proposal consists of clearing one <i>A. accuminata</i> and two <i>E. loxophleba subsp. loxophleba</i> roadside trees. Analysis of aerial imagery, site photographs and GIS datasets indicates the Proposal Area does not intersect any watercourses or wetlands. The nearest mapped watercourse is an unnamed non-perennial minor river, located over [REDACTED]m north-east. The three roadside trees proposed for clearing are not associated with any watercourse or wetland. Based on the above, the proposed clearing is not at variance to this Principle.
Principle (g) – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	The removal of three trees from within an existing largely cleared roadside maintenance zone is unlikely to cause appreciable land degradation, noting the Proposal Area is currently absent of understorey vegetation in a Completely Degraded condition. The

	road maintenance zone is maintained by MRWA to ensure safety to road users which ensures no appreciable land degradation within the Proposal Area or direct vicinity will occur. Based on the above, the proposed clearing is not at variance to this Principle.
Principle (h) – Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.	The Proposal Area is not located within, adjacent to or nearby any conservation areas. The nearest conservation area is the Watheroo National Park , located approximately [REDACTED] metres east. The proposed clearing does not occur in any ecological linkages or corridors that connect areas of ecological significance locally or regionally. The clearing of three degraded road side trees will not result in the fragmentation of any existing continuous tree canopy which may provide ecological linkages for fauna. Noting the above, and given the distance to the nearest conservation area, it is unlikely that the proposed clearing will impact the environmental values of any conservation areas. Based on the above, the proposed clearing is not at variance to this Principle.
Principle (i) – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.	The removal of three trees from the roadside is not likely to cause deterioration in the quality of surface or underground water. The proposed clearing will not require the abstraction or interaction with ground or surface water. Based on the above, the proposed clearing is not at variance to this Principle.
Principle (j) – Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.	The proposed clearing of three roadside trees within an established road maintenance zone is not likely to cause, or exacerbate, the incidence or intensity of flooding. Based on the above, the proposed clearing is not at variance to this Principle.

	Biologic Environmental Survey [Biologic]. (2023). M028 Midlands Road Low-Cost Widening (SLK 24.79 – 77.08): Detailed Flora and Vegetation Survey, Basic Vertebrate Fauna Survey, and Black Cockatoo Habitat Assessment. Photographs of the trees proposed to be used: Appendix 1. Proposal Area Maps: Appendix 2 Shapefile of clearing area/trees: D25#311197 Government of Western Australia (2019) – Statewide Vegetation Statistics - https://catalogue.data.wa.gov.au/dataset/dbca-statewide-vegetation-statistics Groom C. 2011. Plants used by Carnaby's Black Cockatoo. Plants for Carnaby's search tool, DEC, Kensington GIS Datasets - Black Cockatoo Breeding Sites - Buffered (DBCA-063) - Black Cockatoo Roosting Sites - Buffered (DBCA-064) - Carnabys Cockatoo Confirmed Roost Sites (DBCA-050) - Clearing Regulations – Environmentally Sensitive Areas (DWER-046) - DBCA – Legislated Lands and Waters (DBCA-011) - DBCA – Lands of Interest (DBCA-012) - DBCA Restricted WA Herbarium Flora - DBCA Restricted Threatened and Priority Fauna - DBCA Restricted Threatened and Priority Flora - DBCA Restricted Black Cockatoo Roosting Sites - DBCA Restricted White-Tailed Black Cockatoo Breeding Site Locations - DBCA Restricted Forest Red-tailed Black Cockatoo Breeding Site Locations - Directory of Important Wetlands in Australia – Western Australia (DBCA-045) - EPA Redbook Recommended Conservation Reserves 1976 – 1991 (DBCA-029) - FPM Floodplain Area (DWER-020) - Hydrography Linear (DWER-031) - Interim Biogeographic Regionalisation for Australia (IBRA), Version 7 (Regions and Subregions) - Local Government Authority (LGA) Boundaries (LGATE-233) - Medium Scale Topo Water (Line) (LGATE-018) - Native Vegetation Extent (DPIRD-005) - Pre-European Vegetation (DPIRD-006) - Ramsar Sites (DBCA-010) - Threatened Ecological Communities (DBCA-038)
9. REHABILITATION, REVEGETATION AND OFFSETS	
Offset Proposal:	No offset proposal is required as the proposed clearing will not result in significant residual impacts to native vegetation within the region.

Revegetation and Rehabilitation:	No temporary clearing will be undertaken as part of the Proposal activities.	
10. COMPLIANCE WITH CPS818		
The clearing associated with the proposal is not at variance with the Clearing Principles. Additional management actions under CPS 818 are detailed below.		
Impact of Clearing	Yes/No or NA	Further Action Required
1. Proposal is within a Region that: - has rainfall greater than 400mm; and, - is South of the 26th parallel.	No	Standard Vehicle and Plant Management Actions Hygiene Checklists (D17#859669) and Vehicle, Plant and Machinery Hygiene Vehicle Register Template (D23#179551) will be applied
2. Do the proposed works require clearing within or adjacent to DBCA managed lands in non-dry conditions?	No	No further action required.
3. Main Roads has been notified by DWER or an environmental specialist that the area to be cleared is susceptible to a pathogen other than dieback.	No	No further action required.
4. Weeds are likely to spread to and result in environmental harm to adjacent areas of native vegetation that are in good or better condition.	No	No further action required.
Completed By:		
Name	[REDACTED]	
Signature	[REDACTED]	
Job Title	Graduate Environment Officer	
Date	3/06/2025	

Once all sections are completed, send the form to CRSP for review and endorsement.

DECISION ON CLEARING ASSESSMENT	
Name	[REDACTED]
Job Title	Environment Contractor
Date	10/06/2025

APPENDIX 1 – Proposal Area Clearing



Plate 1. Photographs of the two York Gums (*Eucalyptus loxophleba*) to be cleared on Midlands Rd (M028) at [REDACTED].



Plate 2. Google Maps (2020) Streetview imagery of two York Gums (*Eucalyptus loxophleba*) proposed for clearing on Midlands Rd (M028) at [REDACTED].



Plate 3. Google Maps (2020) Streetview imagery of two York Gums (*Eucalyptus loxophleba*) proposed for clearing on Midlands Rd (M028) at [REDACTED].



Plate 4. Google Maps (2020) Streetview imagery of two York Gums (*Eucalyptus loxophleba*) proposed for clearing on Midlands Rd (M028) at [REDACTED].

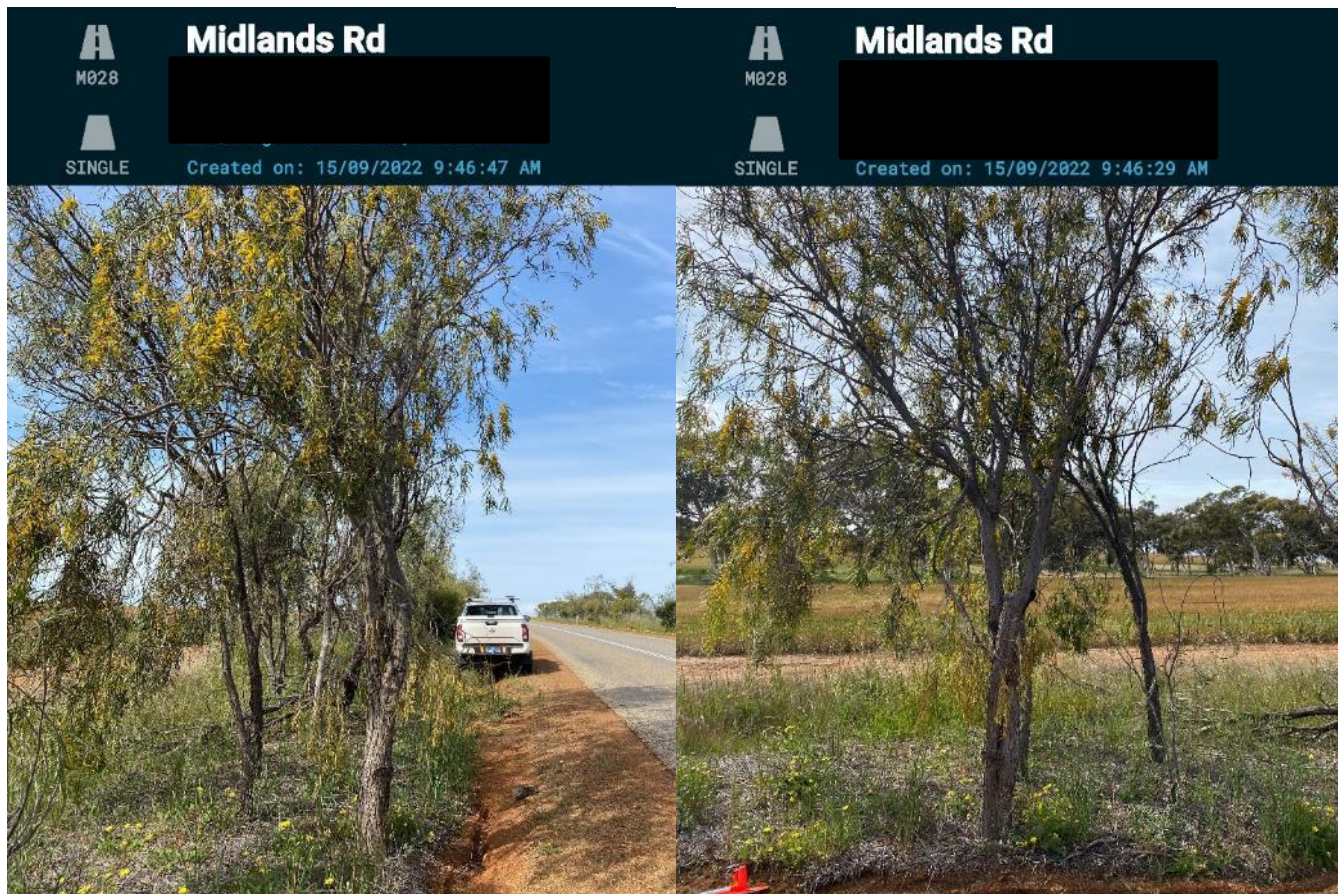


Plate 5. Photographs of one Jam Wattle (*Acacia acuminata*) to be cleared on Midlands Rd (M028) at [REDACTED].



Plate 6. Google Maps (2020) Streetview imagery of two York Gums (*Eucalyptus loxophleba*) proposed for clearing on Midlands Rd (M028) at [REDACTED].

Appendix 2: Proposal Area Maps

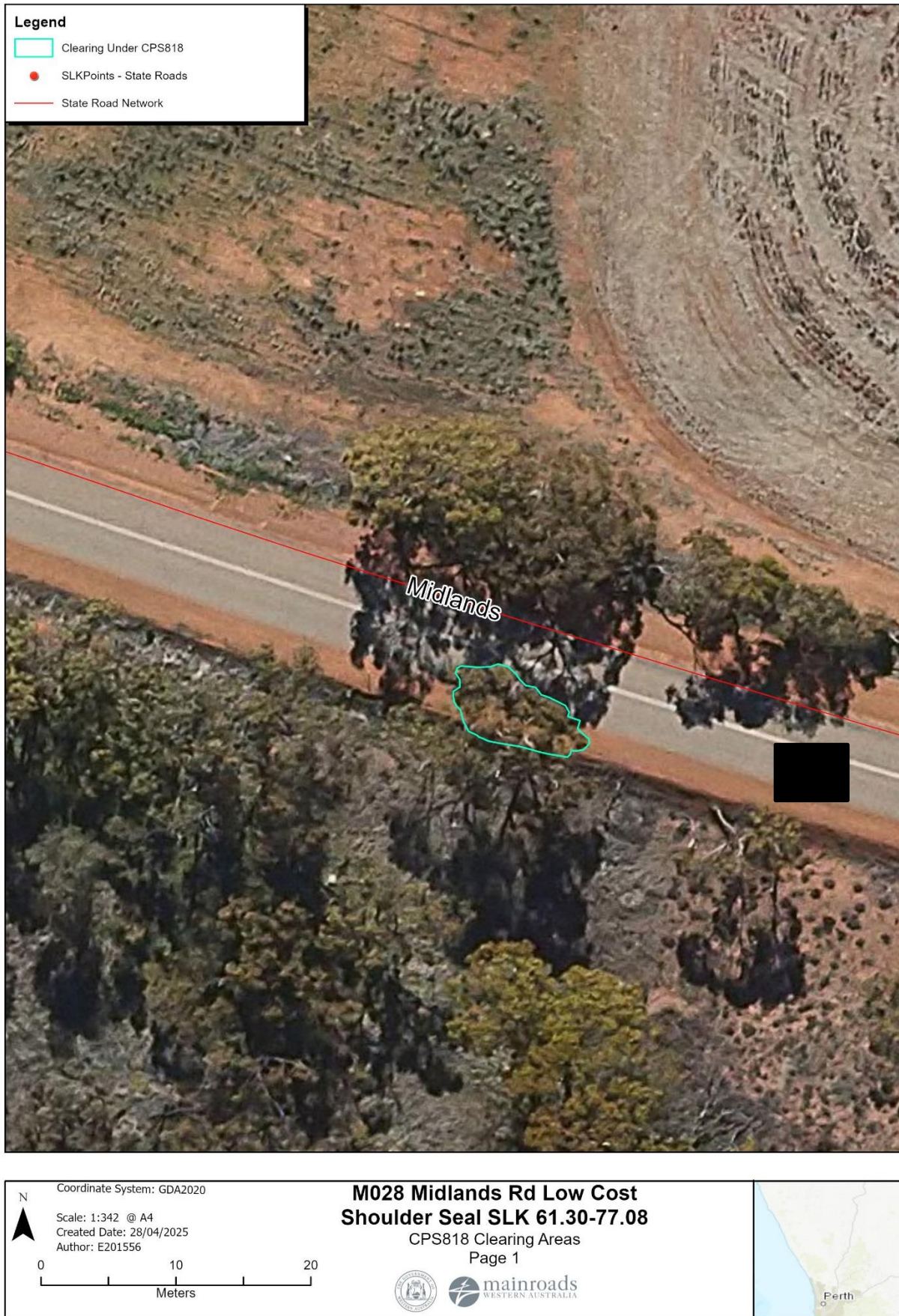


Figure 1. Map of Areas to be cleared (2x *Eucalyptus loxophleba* at [REDACTED])

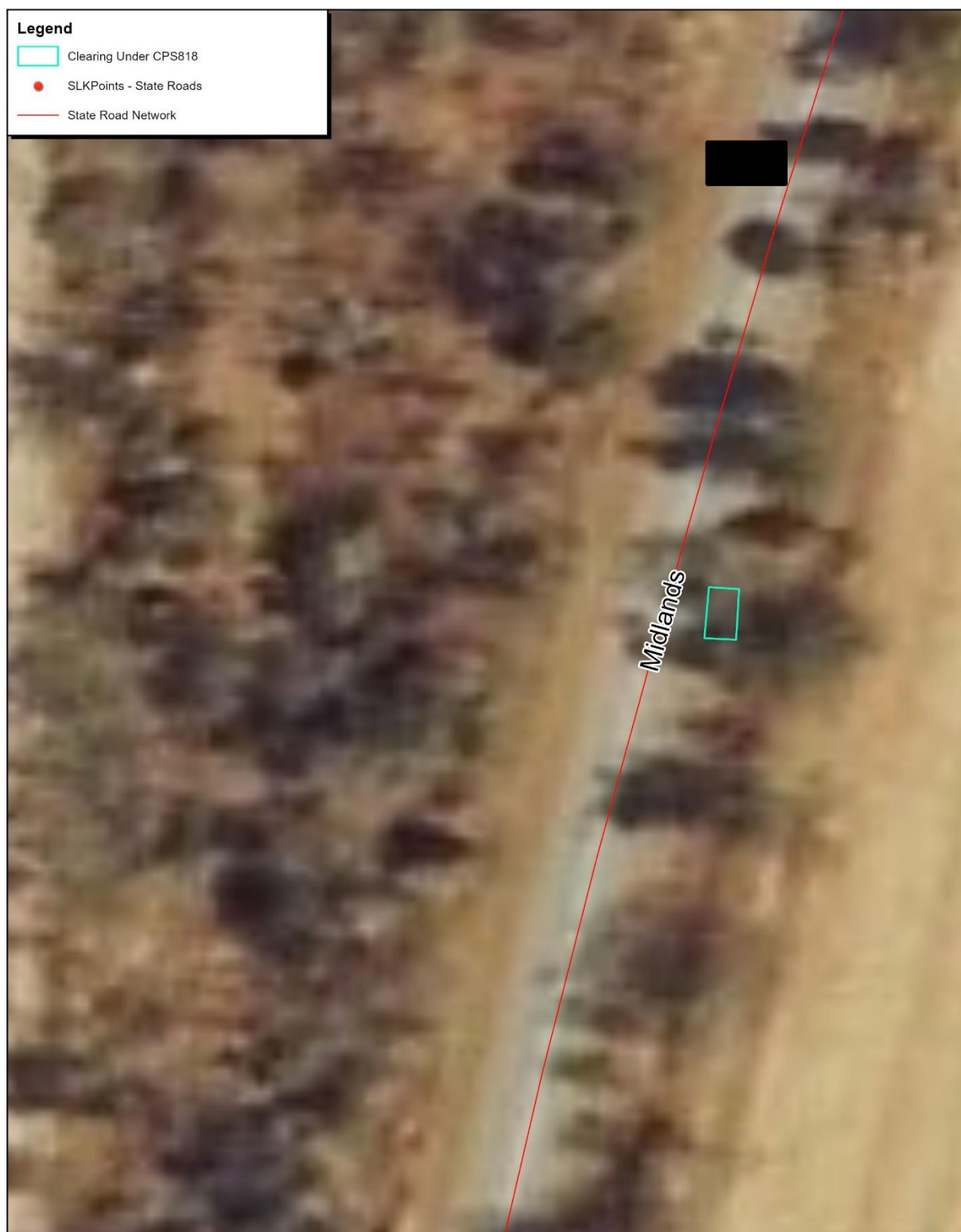


Figure 2. Map of Area to be cleared (*Acacia acuminata* at [REDACTED])